

Message

From: Distler, Ken [Kenneth_Distler@kindermorgan.com]
Sent: 9/9/2019 8:27:11 PM
To: Topinka, Natalie [topinka.natalie@epa.gov]; Bennett, Dee [Dee_Bennett@kindermorgan.com]
Subject: RE: Request for Extension to 2-Year Leak Repair Requirement under NSPS OOOOa - Compressor Station 312

Hello Natalie,

I handle the air permitting/compliance activities for NGPL in IL.

We had submitted the request to the ILL EPA prior to the regulatory 2-year deadline of August 22. After receiving verbal notification, from the ILL EPA on Aug 19 that the request was rejected, NGPL decided to blowdown and affect repair prior to Aug 20th in order to avoid exceeding the 2-year repair- regulatory deadline.

However,

As applicability of this rule becomes more common, this type of scenario is likely to occur in the future, I would like to pursue your thoughts in the event a similar situation arises....

I'll give you a call to discuss...ken

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From: Topinka, Natalie [mailto:topinka.natalie@epa.gov]
Sent: Monday, September 9, 2019 1:27 PM
To: Bennett, Dee
Cc: Distler, Ken
Subject: Re: Request for Extension to 2-Year Leak Repair Requirement under NSPS OOOOa - Compressor Station 312

[This email message was received from the Internet and came from outside of Kinder Morgan]

Hello Dee,

I just left you a voicemail regarding the above-referenced request. I have one initial question: is the location of the leak also considered part of a closed-vent system associated with a centrifugal compressor or reciprocating compressor affected facility? If so, the scenario you describe, where the emissions from a blowdown would be greater than the emissions from letting the leak continue, is already contemplated, and delay of repair is allowed.

See the select citations from NSPS OOOOa:

60.5416a(b) No detectable emissions test methods and procedures. If you are required to conduct an inspection of a closed vent system or cover at your centrifugal compressor, reciprocating compressor, or pneumatic pump affected facility as specified in paragraphs (a)(1), (2), or (3) of this section, you must meet the requirements of paragraphs (b)(1) through (13) of this section.

(b)(10) Delay of repair. Delay of repair of a closed vent system or cover for which leaks or defects have been detected is allowed if the repair is technically infeasible without a shutdown, or if you determine that emissions resulting from immediate repair would be greater than the fugitive emissions likely to result from delay of repair. You must complete repair of such equipment by the end of the next shutdown.

60.5397a(h) Each identified source of fugitive emissions shall be repaired or replaced in accordance with paragraphs (h)(1) and (2) of this section. For fugitive emissions components also subject to the repair provisions of

§§60.5416a(b)(9) through (12) and (c)(4) through (7), those provisions apply instead to those closed vent system and covers, and the repair provisions of paragraphs (h)(1) and (2) of this section do not apply to those closed vent systems and covers.

If the above provisions do not apply to the scenario at Compressor Station 312, I will need to look into what regulatory authority may consider an extension of time. Let me know when is a good time to discuss the request.

Thanks,

Natalie

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